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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

STEPHANIE ENYART

Case No.: C09-05191 CRB

Plaintiff,

v

NATIONAL CONFERENCE OF BAR EXAMINERS, INC.

STIPULATED REQUEST TO: 1) MODIFY BRIEFING AND HEARING SCHEDULE FOR PLAINTIFF'S MOTION FOR REASONABLE ATTORNEYS' FEES AND COSTS; AND 2) ENLARGE TIME FOR COMPLETING FILING OF PLAINTIFF'S MOTION FOR FEES AND COSTS AND BILL OF COSTS

HONORABLE CHARLES R. BRYER

Defendant.

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1 **I. Action Requested**

2 Pursuant to Civil L.R. 6-2 and Civil L.R. 7-12, plaintiff Stephanie Enyart and
 3 defendant National Conference of Bar Examiners ("NCBE") (hereinafter, "the parties"),
 4 jointly stipulate and request an order: 1) modifying the briefing and hearing schedule on
 5 Plaintiff's Motion for Fees and Costs; and 2) enlarging, by one day, the time for Plaintiff
 6 to complete her filing of her Motion for Attorneys Fees and Costs and Bill of Costs.

7 **II. Stipulation Regarding Requested Action**

8 IT IS HEREBY STIPULATED between and among the parties, by and through
 9 their respective counsel of record, subject to the approval of the Court, which plaintiff
 10 and defendant jointly request, as follows:

11 WHEREAS, on November 4, 2011, this Court entered final judgment for Plaintiff;

12 WHEREAS, Plaintiff was required to file her Motion for Attorneys' Fees and
 13 Costs and Bill of Costs on December 5, 2011, but due to technical difficulties, Plaintiff
 14 did not complete her filing until after midnight on December 5, 2011;

15 WHEREAS, Plaintiff's filings included certain errors that Plaintiff wishes to
 16 correct;

17 WHEREAS, the parties have agreed to extend the time for Plaintiff to complete
 18 the filing of Plaintiff's Motion for Fees and Costs and Plaintiff's Bill of Costs to December
 19 6, 2011;

20 WHEREAS, Plaintiff wishes to file the amended documents listed below to
 21 correct errors found in the original filings.

22 WHEREAS, under the current briefing schedule, Defendant's opposition to
 23 Plaintiff's Motion for Reasonable Attorneys' Fees and Costs would be due to the Court
 24 by December 19, 2011, and Plaintiff's reply to Defendant's opposition would be due to
 25 the Court by December 26, 2011;

26 WHEREAS, the parties have agreed to a modified briefing schedule to account
 27 for the upcoming holidays;

1 WHEREAS, this Court has previously granted a single stipulated request by the
 2 parties to enlarge time for filing of Plaintiff's Motion for Reasonable Fees and Costs and
 3 Plaintiff's Bill of Costs to 30 days from final entry of judgment;

4 THE PARTIES HEREBY STIPULATE AS FOLLOWS:

5 1. The time for Plaintiff to complete the filing of Plaintiff's Motion for Attorneys
 6 Fees and Costs and Plaintiff's Bill of Costs be extended by one day to Tuesday
 7 December 6, 2011.

8 2. Plaintiff be permitted to file the following amended pleadings to correct errors
 9 in her original filings:

- 10 • [Amended] BILL OF COSTS
- 11 • [Amended] DECLARATION OF ANNA LEVINE IN SUPPORT OF PLAINTIFF'S
 BILL OF COSTS, with supporting exhibits incorporating an [Amended] Exhibit B
- 12 • [Amended] PLAINTIFF'S NOTICE OF MOTION AND MOTION FOR
 REASONABLE ATTORNEYS' FEES AND COSTS; MEMORANDUM OF
 POINTS AND AUTHORITIES IN SUPPORT
- 13 • [Amended] DECLARATION OF LAURENCE PARADIS IN SUPPORT OF
 PLAINTIFF'S MOTION FOR REASONABLE ATTORNEYS' FEES AND COSTS,
 with supporting exhibits incorporating an amended Exhibit J
- 14 • [Amended] DECLARATION OF DANIEL F. GOLDSTEIN IN SUPPORT OF
 PLAINTIFF'S MOTION FOR REASONABLE ATTORNEYS' FEES AND COSTS,
 with supporting exhibits incorporating an [Amended] Exhibit B
- 15 • [Amended] DECLARATION OF SCOTT C. LABARRE IN SUPPORT OF
 PLAINTIFF'S MOTION FOR REASONABLE ATTORNEYS' FEES AND COSTS.

16 3. Defendant's Opposition to Plaintiff's Motion for Reasonable Attorneys' Fees
 17 and Costs will be due no later than January 6, 2012, and Plaintiff's reply to Defendant's
 18 opposition to Plaintiff's motion will be due no later than January 20, 2012.

19 4. The hearing on Plaintiffs' Motion for Attorneys Fees and Costs be moved to
 20 February 10, 2012 at 10:00 a.m.

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2 Dated: December 7, 2011

Respectfully Submitted,
DISABILITY RIGHTS ADVOCATES
By: /s/ Laurence Paradis
Attorneys for Plaintiff

5 COOLEY LLP
6 By: /s/ Gregory C. Tenhoff
7 Attorneys for Defendant
8

9 I hereby attest that I have on file all holograph signatures for any signatures indicated by
a "conformed" signature (/s/) within this e-filed document.
10

11 /s/
Laurence W. Paradis
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15 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**
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20 December 9, 2011
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